



- ❖ Tom Donahue, BROCC Community Action in Southwestern Vermont (BROC)
- ❖ Sue Minter, Capstone Community Action
- ❖ Jan Demers, Champlain Valley Office of Economic Opportunity (CVOEO)
- ❖ Jenna O'Farrell, Northeast Kingdom Community Action (NEKCA)
- ❖ Stephen Geller, Southeastern Vermont Community Action (SEVCA)

December 3, 2019

Administration for Children and Families  
Office of Planning, Research, and Evaluation  
330 C Street SW  
Washington, DC 20201

Re: Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Report (OMB No.: 0970-0492)  
OPRE Reports Clearance Officer:

We are writing as members of the Vermont Community Action Partnership to address the proposed information collection entitled, "Proposed Information Collection Activity; Community Services Block Grant (CSBG) Annual Report (OMB No.: 0970-0492)", which was published in the Federal Register on October 2, 2019.

The Vermont Community Action Partnership is the Statewide membership association linked to the nation's more than 1,000 Community Action Agencies (CAA). Whose mission is to "ensure that the causes and conditions of poverty are effectively addressed and to strengthen, promote, represent and serve its Network of member Agencies." CAAs cover 99% of counties in 50 states, the District of Columbia, and Puerto Rico, and touch the lives of 15 million low-income individuals, 6.2 million families, and 3.9 million children. Community Action Program Legal Services, Inc. (CAPLAW) provides the legal, governance, and management resources necessary to sustain and strengthen the national CAA network. Its consultation, training, and resources allow CAAs to operate legally sound and well-governed community organizations.

Each of our member agencies receive funds through the CSBG and report information about our activities to the state and federal government as part of the CSBG Annual Report. This engagement gives our organizations unique insight into the substantive and procedural aspects of that reporting, which is the subject of this public submission. Collecting information for the CSBG Annual Report is crucial to the efficacy and accountability of our organizations. It identifies how effectively we are serving our communities and how we might be able to serve them better. However, the frame and scope of a question can magnify different narratives in a data set and we are committed to supporting a process that yields the most accurate representation of our network as a whole. With that commitment in mind, the comments in this public submission address issues apparent in the proposed collection that we believe could lead to an imprecise or incomplete Annual Report. Insight into the substantive and procedural aspect of the reporting, which again is the subject of this public submission.

## I. Background

The Community Services Block Grant Act (the Act) requires each state to report annually to the Department of Health and Human Services (HHS) on the performance of the state and CSBG-eligible entities within that state. The Act also requires HHS to submit an annual report to Congress summarizing allocated CSBG funds and the impact of those funds on clients in served communities. In early 2017, the Office of Management and Budget (OMB) authorized the Office of Community Services (OCS) to collect CSBG Annual Report information for three years, expiring on January 31, 2020. OCS separated the Annual Report into four modules: state administration; CSBG eligible entity expenditures, capital, and resources; community level information; and individual and family information.

On October 2, 2019, OCS published a proposal to continue annual report information collection and disseminated proposed changes to the questions presented in the modules. Along with the proposed changes, OCS specifically requested comments on the following topics: “(a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency’s estimate of the burden of the proposed collection of information; (c) the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden including through the use of automated collection techniques or other forms of information technology.”

This public submission addresses the Community Action network’s concerns with some of the proposed changes as well as its support for others. We believe in the adoption of the suggestions.

## II. Necessity and Practical Utility of Information to be Collected

The proposed collection of information is necessary and beneficial for OCS to perform its function as a liaison to the Community Action network. Accurate, representative reporting of quality data is crucial to the continued success of Community Action. The CSBG Annual Report provides vital data about our network to local CAAs, state associations, state CSBG lead agencies, and national partner organizations that not only demonstrates successes, but identifies areas where the network can improve the provision of assistance and services to families and communities. Although Module 1 is the main focus of this proposed information collection, we believe that aspects of Modules 2, 3, and 4 would also benefit from modifications. We are committed to working with OCS and other stakeholders in a future information collection to solicit feedback from the network on updates to these Modules, which will yield a more accurate and inclusive representation of the positive effects CSBG funds have in our communities.

## III. Accuracy of Burden Estimate

OCS’s estimate of the burden of the proposed collection of information on respondents is generally accurate, with the exception of two issues of concern. First, the proposal’s burden estimate is partially based on the agency’s assertion that there are 1,035 eligible entity respondents. However, the most recent CSBG Annual Report to Congress identifies 1,026 eligible entities. In light of this discrepancy, we believe the annual burden for eligible entities should be reduced to 246,469 hours in order to reflect this reduction. Second, the additional questions proposed in the information collection will increase the burden on both states and eligible entities and, as such, the average burden hours per response should be increased to reflect this additional burden.

## IV. Quality, Utility, and Clarity of Information to be Collected

Ensuring the quality, utility, and clarity of the questions presented and data collected through the CSBG Annual Report process is paramount. While we appreciate the willingness of OCS to adjust and update the questions in the reporting modules, we believe that the following Module 1 proposals require further study or present unnecessary challenges:

### *b. Module 1 § D.2*

Section D.2 requires states to report the quantity of CSBG eligible entities in the state that met all state-adopted organizational standards. The information is reported in a table that requires states to breakdown how many eligible entities met 100%, 90%-99%, 80%-89%, and 70%-79% of the organizational standards, respectively. The proposed collection adds one additional row, requiring states to report the number of eligible entities that met less than 69% of the state organizational standards. Although we do not oppose the addition of the new percentile reporting, OCS should clarify this proposed change for the network, specifically why it believes reporting the lower percentile is necessary.

*c. Module 1 § D.3*

Section D.3 requires states to report on their response to unmet organizational standards. In the current CSBG Annual Report, states must disclose how many eligible entities with unmet organizational standards were placed on Technical Assistance Plans (TAP) as well as how many were given Quality Improvement Plans (QIP). The new proposal removes QIP reporting from this section, making section H on Monitoring, Corrective Action, and Fiscal Controls where states report on QIPs. We support this removal as it more accurately reflects the way in which the Community Action network operates.

*d. Module 1 § E*

Section E requires states to report on the use of CSBG funds, including allocations, obligations, and expenditures. The current proposed information collection includes changes to multiple subsections of section E, including updated financial categories and explanations. The network is concerned that including these adjustments without clarification regarding their inclusion will dilute the purpose of the Annual Report to serve as an accurate reflection of the Community Action network's performance.

Of particular concern is Section E.10, which requires states to report on the unobligated balance for the federal fiscal year. The proposed collection attempts to align this reporting requirement with the unobligated balance of federal funds in other federal financial reports. We are concerned that this will decouple federal spending reporting from measurable CSBG outcomes because federal grants are on a 24-month timeline. The report was established, in part, to provide a clear picture of the direct outcomes of CSBG allocations and the integrity of the report will be compromised if spending and demographic outcomes are misaligned. While we understand that OCS is attempting to align the CSBG Annual Report with other instances of federal financial reporting. We believe that all stakeholders would benefit from a more deliberate revision process. To that end, we urge that no changes be made to Section E during the current OMB clearance process and that OCS form an advisory committee including members of stakeholder organizations to research what changes to the financial disclosure section, if any, are necessary for OCS to fulfill its obligations. At a minimum, we urge OCS to immediately convene stakeholders to solicit feedback on how to address these issues prior to the 30-day clearance period to solicit comments from the public to OMB.

*e. Module 1 §§ H.4-5*

Section H of the Annual Report deals with monitoring and corrective action. The proposed changes convert the current sections H.4 and H.5 concerning QIP reporting into H.4a and H.4b and adds a new section H.5 to address the use of TAPs. To better align with section 678C of the Act, which gives the state the option to also provide training and technical assistance (T/TA) to an eligible entity as part of a corrective action process, we recommend deleting Section H.5, renumbering Section H.4 so that H.4a is H.4b and H.4b is H.4c, and adding Question H.4a to address T/TA provided in connection with a QIP. We also recommend asking a threshold question that would allow states without any eligible entities on QIPs during the reporting period to skip the sub-questions in this section. We recommend revising Section H.4 as follows:

**H.4. Reporting Quality Improvement Plans (QIPs)**

Were any CSBG eligible entities on a Quality Improvement Plan during the reporting period?

- ☐ Yes
- ☐ No

*[If the state checks YES, the state should proceed to answer questions H.4a, H.4b, and H.4c. If the state checks NO, it can skip the remaining questions addressing QIPs]*

**H.4a. Training and Technical Assistance (T/TA):** Did the state offer T/TA to eligible entities in connection with a Quality Improvement Plan (QIP)?

- ☐ Yes
- ☐ No

**H.4b. Quality Improvement Plans (QIPs):** Did all CSBG eligible entities on Quality Improvement Plans resolve identified deficiencies within the schedule agreed upon by the state and eligible entity?

- ☐ Yes
- ☐ No

**H.4c. Reporting QIPs:** Did the state report all CSBG eligible entities with serious deficiencies from a monitoring review to the Office of Community Services within 30 calendar days of the state approving a QIP?

- ☐ Yes
- ☐ No

*f. Module 1 § H.6*

CSBG eligible entities are required to submit their annual audits to the Federal Audit Clearinghouse (FAC). The state must review each audit and, if there is an audit finding related to the program or questioned costs, issue and report a management decision. State accountability measures issued by OCS require states to report on whether and when any management decisions were issued. The proposed information collection adds a yes/no question that reads as follows: "Did the state have Single Audits in the Federal Audit Clearinghouse during this reporting period?" We oppose the inclusion of this question because all eligible entities are legally required to submit audits to the FAC in each reporting period. Essentially, owing to state accountability requirements, the answer to this question should never be "No," and the question should, therefore, be removed.

**V. Minimizing Burden of Information Collection on Respondents**


Frictionless reporting processes are essential to an accurate, comprehensive CSBG Annual Report. We support the past and current initiatives by OCS and the National Association of State Community Services Programs (NASCSPP) to streamline the process through online reporting. Continued training for eligible entities, state associations, and state offices on reporting requirements and processes will also reduce burdens on information collection. Finally, we believe that accepting the suggestions in this public submission, especially increased clarity on financial reporting terms and requirements, would make the reporting process less burdensome for all respondents.

**VI. Conclusion**

The CSBG Annual Report is fundamental to the Community Action network's ability to provide effective assistance and services to our communities. Our investment in the quality, accuracy, and completeness of that report has prompted us to review the proposed changes and request the adjustments set forth in this public submission.

OCS has a history of productive collaboration with the Community Action network on significant issues including CSBG data collection and accountability mechanisms. We believe that renewed cooperation is essential to meet the needs of not just Congress and OCS, but states and agencies as well. The Vermont Community Action Agencies listed below appreciate the opportunity to be a part of the dialog surrounding CSBG issues and look forward to working closely with OCS and Other members of the Community Action network to identify solutions that work for all parties and ensure a timely clearance reauthorization.

Our best to you,



Jan F. Demers, Champlain Valley Office of Economic Opportunity (CVOEO)

Tom Donahue, BROCC Community Action in Southwestern Vermont (BROCC)

Sue Minter, Capstone Community Action

Jenna O'Farrell, Northeast Kingdom Community Action (NEKCA)

Stephen Geller, Southeastern Vermont Community Action (SEVCA)